# ELLIOTT & ELLIOTT, P.A.

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February 18, 2015

## **VIA E-FILING**

Jocelyn Boyd, Esquire Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

RE:

B2 Holdings, LLC, Complainant/Petitioner v. Carolina Water Service, Inc.

Defendant/Respondent Docket No. 2014-481-WS

Dear Ms. Boyd:

As the record will reflect, this firm represents the Defendant/Respondent Carolina Water Service, Inc. in the above-captioned docket. Enclosed you will find a Motion for the Appointment of a hearing examiner or in the alternative, appointment of a hearing officer.

The Defendant/Respondent has filed a motion to dismiss the complaint herein and the Complainant/Petitioner has filed a motion to amend the complaint. The Defendant/Respondent's deadline for pre-filing direct testimony is February 25, 2015 and the hearing is scheduled for March 25, 2015. Because the schedule is abbreviated, time does not permit the Commission to address either pending motion prior to the remaining prefiling deadlines established in this docket. Moreover, if either pending motion is granted, the procedural schedule would of necessity be eliminated or altered. Accordingly I would request a stay of all existing pre-filing deadlines in this matter until the parties' motions are heard and disposed of.

Last, I would request a status conference be held in this matter as soon as practicable. I have consulted with counsel for the parties and am informed that both are of the view that a status conference will be of benefit to both the Commission and parties to this docket. I am available at the call of the Commission to attend a status conference.

By copy of this letter I am serving all parties of record. Please let the parties have your earliest reply. If the parties or you have questions I would be happy to address them.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/lbk

**Enclosures** 

cc: All Parties of Record w/enc.

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF

#### **SOUTH CAROLINA**

Docket No.: 2014-481-WS

IN RE:	B-2 Holdings, LLC	)	
	Complainant/Petitioner	)	
		)	
	v.	)	
		)	MOTION FOR APPOINMENT
	Carolina Water Service, Inc.	)	OF A HEARING EXAMINER
	Defendant/Respondent	)	

Carolina Water Service, Inc., the Defendant/Respondent in the above referenced matter, moves the South Carolina Public Service Commission ("Commission") for an order appointing a hearing examiner to convene a hearing to take evidence with respect to the complaint herein and make recommendations to the Commission. In the alternative, the Defendant/Respondent moves for the appointment of a hearing officer in the above referenced matter in order to expedite the consideration of procedural and non-dispositive motions in accordance with the Commission's regulations.

Respectfully submitted,

Scott Elliott

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Columbia, South Carolina February 18, 2015

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: B2 Holdings, LLC, Complainant/Petitioner v. Carolina

Water Service, Inc., Defendant/Respondent

Docket No. 2014-481-WS

PARTIES SERVED: Jeffrey M. Nelson, Esquire

Office of Regulatory Staff 1401 Main Street, Suite 900

Columbia, SC 29201

Laura P. Valtorta, Esquire

903 Calhoun Street Columbia, SC 29201

PLEADINGS: Motion for Appointment of Hearing Examiner

February 18, 2015

Linda B. Kitchens Legal Assistant

B Std